

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**CARROLL INDEPENDENT SCHOOL
DISTRICT,**

Plaintiff,

v.

**UNITED STATES DEPARTMENT OF
EDUCATION; ET AL.,**

Defendants.

Case No. 4:24-cv-00461-O

**PLAINTIFF'S NOTICE OF FILING
OPPOSITION TO DEFENDANTS' MOTION TO CONSOLIDATE**

Earlier today, in *State of Texas, et al. v. United States Department of Education, et al.*, 2:24-cv-86-Z (N.D. Tex.), Plaintiff moved for leave to file a response in opposition to Defendants' motion to consolidate this case with No. 2:24-cv-86-Z, along with its brief in opposition to consolidation. Copies of the motion and brief are attached here.

Respectfully submitted this 7th day of June, 2024.

Tim Davis

Texas Bar No. 24086142

Allison Allman

Texas Bar No. 24094023

Trevor Paul

Texas Bar No. 24133388

JACKSON WALKER LLP

777 Main Street, Suite 2100

Fort Worth, Texas 76102

Telephone: (817) 334-7200

tdavis@jw.com

aallman@jw.com

tpaul@jw.com

Jonathan A. Scruggs*

Arizona Bar No. 030505

ALLIANCE DEFENDING FREEDOM

15100 N. 90th Street

Scottsdale, Arizona 85260

Telephone: (480) 444-0020

Facsimile: (480) 444-0028

jscruggs@ADFlegal.org

/s/ Natalie D. Thompson

Natalie D. Thompson**

Texas Bar No. 24088529

ALLIANCE DEFENDING FREEDOM

440 First Street NW, Suite 600

Washington, DC 20001

Telephone: (202) 393-8690

Facsimile: (202) 347-3622

nthompson@ADFlegal.org

Tyson C. Langhofer*

Virginia Bar No. 95204

Mathew W. Hoffmann*

Virginia Bar No. 100102

ALLIANCE DEFENDING FREEDOM

44180 Riverside Pkwy

Lansdowne, Virginia 20176

Telephone: (571) 707-4655

Facsimile: (571) 707-4656

tlanghofer@ADFlegal.org

mhoffmann@ADFlegal.org

Counsel for Carroll ISD

**Admitted pro hac vice*

***Practice supervised by one or more D.C.
Bar members while D.C. Bar application is
pending.*

CERTIFICATE OF SERVICE

I certify that on June 7th, 2024, this document was served on all counsel of record via the Court's CM/ECF system.

/s/ Natalie D. Thompson

Natalie D. Thompson

Counsel for Carroll ISD